

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Jose L. Linares
	:	
	:	
v.	:	Criminal No. 10-53
	:	
	:	
MOSHE ALTMAN	:	<u>PROTECTIVE ORDER BY CONSENT</u>

This application having been opened to the Court by the United States (Paul J. Fishman, United States Attorney, by Bradley A. Harsch, Assistant U.S. Attorney, appearing) under Rule 16(d)(1) of the Federal Rules of Criminal Procedure for a protective order limiting disclosure of protected materials that will be provided to defense counsel pursuant to the Court's standing discovery, which may include (a) recorded conversations of defendant and others; (b) wire and electronic communications intercepted pursuant to 18 U.S.C. § 2510 et seq.; (c) transcripts of recorded conversations and intercepted communications; (d) investigative agency reports; (e) e-mail correspondence; (f) SMS text message correspondence; (g) testimonial and non-testimonial transcripts (h) search warrant materials; (i) plea materials and (j) affidavits (collectively, the "Protected Materials"); and

For good cause shown; and

The parties having consented:

IT IS on this 16 day of February , 2010,

ORDERED that:

1. The Protected Materials shall not be disclosed to anyone other than defendant, defendant's counsel and/or any agent working at the direction of defense counsel in this matter;
2. The Protected Materials only will be used in the preparation of the defense in this case and notwithstanding the provisions of Paragraph 1, the defense shall be permitted to review, with prospective witnesses and their counsel, all materials referenced in Paragraph 1 to the extent necessary to prepare the defense;
3. Notwithstanding any other provision, the defense shall be permitted to disclose any materials provided in Paragraph 1 in connection with the filing of the defendant's motions with the Court, or for use at trial; and

4. If there is a need prior to trial or during trial to disclose the Protected Materials beyond that permitted by this Order, then the defendant will make an application to the Court, upon notice to the government, requesting authorization.



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HONORABLE JOSE L. LINARES  
UNITED STATES DISTRICT JUDGE

Accepted and Acknowledged:

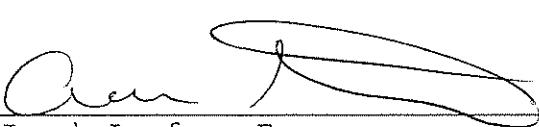
UNITED STATES ATTORNEY  
PAUL J. FISHMAN

BY:



BRADLEY A. HARSCH  
Assistant U.S. Attorney

DEFENDANT MOSHE ALTMAN  
(by his counsel)



Jacob Laufer, Esq.